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**FILED**

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

SEP 19 2011 NF  
SEP 19 2011  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

Lang Exterior, Inc.  
An Illinois Corp.  
Plaintiff

V

CIVIL ACTION #11 CV 5517  
Honorable Rebecca R. Pallmeyer  
Room 2119

Lang Windows, Inc.  
And Dionne Lang an  
Illinois Corp. & Individual  
Defendant

Magistrate Sheila M. Finnegan

**DEFENDANT'S MOTION FOR MANDATORY INJUNCTION / THE  
ALTERNATIVE PETITION FOR RULE TO SHOW CAUSE FOR  
"SANCTIONS" FOR DEFAMATORY REMARKS w/AFFIDAVIT**

IN ACCORDANCE TO THE FEDERAL RULES OF CIVIL  
PROCEDURE:

Now comes , Dionne Lang, Attorney Pro Se in this cause respectfully  
represents to this court her Motion for Mandatory Injunction/The alternative  
Petition for Rule to Show Cause for "Sanctions" for Defamatory Remarks  
w/Affidavit;

Her reasons are recorded in the attached affidavit;

Dionne Lang

5441 Fairmount Ave.  
Downers Grove Illinois 60515  
(630) 487-8312

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**AFFIDAVIT**

In support of Motion for Mandatory Injunction/the alternative  
Petition for Rule to Show Cause for "Sanctions" for defamatory remarks;

**{Pursuant to the Rules of Federal Civil Procedure}**

I Dionne Lang, Pro Se being duly sworn on oath states:

- 1.) That this Honorable Court never at any time issue a ruling stating Defendant violated any Trademark agreements or ordered the attorneys to generate any correspondence to any of Defendant's sales representatives or manufactures;
- 2.) That the Defendant has been stalked and Harassed by unknown individuals identifying themselves to said neighbors as Private investigators relating to this matter, said Police had been summoned but because they remained parked at a neighboring park which is Public grounds no report was filed but they made a note of the events;  
A- One vehicle was a **Ford SUV license #9149115**, white Dodge Caravan, when Police were called they immediately drove to the Public park;
- 3.) That said attorney **Edwin Getz, of 191 North Wacker Drive, suite 3700**, Chicago, Ill. 60606, took it upon himself to forward a disparaging letter, (Polaris Manufacturing Co.) who were going to supply windows for Dionne Lang under a private label;  
A- Said letter hereto attached, as **Group Ex A**, August 30, 2011, states *"Our law firm Lang Exterior owns all rights in the Lang and Lang Exterior Trademarks et al"*;
- 4.) That due to the negative unlawful communication generated to **Polaris Manufacturing Co., Vice -President (Michael Graham)** of Polaris Technology, 500 Victoria Road, Austin Town Ohio 44515, letter states, *"at this time we are not able to continue with the windows program, we have been working on, Polaris Technology does not want to get in the middle of a legal battle between the companies et al."*;  
B- Said letter, hereto attached, **Group Ex. B**, states *"we would like for you to dispose of the literature and warranties with the Lang name printed on them for you et al"*;

- 5.) That Lang Exterior generated a letter to all of Defendant's customers, stating *"it has come to our attention that a company operating under the name Lang Windows, Inc. et al is using the Lang name in it's sales advertisement et al"*. See Group Ex C, July 28, 2011, letter to all Dionne Lang's customers;
- 6.) That as of September 16, 2011, Defendant noticed Plaintiff have included Lang Windows, Inc on their website as their company a total fabrication;

**Wherefore Defendant respectfully requests:**

- A- Order the Attorneys to Immediately retract and submit a letter of apology to Dionne Lang and Polaris Manufacturing Co.
- B- Order the Attorneys to immediately retract all letters sent to all customers;
- C- Appropriate the necessary Injunctions prohibiting Plaintiffs from engaging in said future acts against the Defendant;
- D- That Sanctions against the Plaintiffs and related parties shall issue; Furthermore, A memorandum in support of the relief requested is attached;

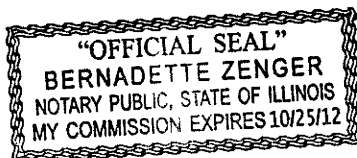
**FURTHER AFFIANTH SAYETH NOT**

Under penalties as provided by law pursuant to 735 1265 5/1 -109, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters, the undersigned certifies as aforesaid that he verily believe the same to be true.

Subscribed and sworn to before me this  
12<sup>th</sup> day of September 2011

Notary

*Bernadette Zenger*



Dionne Lang

*Dionne Lang*

5441 Fairmont Ave.

Downers Grove Illinois 60615

(630) 487-8312

Pro Se